



U.S. Department of Justice

United States Attorney  
Southern District of New York

Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278

April 23, 2024

**BY ECF**

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Roman Israilov**  
S5 22 Cr. 20 (PGG)

Dear Judge Gardephe:

Pursuant to the Court's Order dated April 19, 2024 (D.E. 454), the Government submits this letter in response to the petition (the "Petition") filed by Viktoria Shakarova ("Petitioner") asserting an interest in the real property located at 8090 Kent Street, Jamaica, NY 11432, Block: 7232, Lot 40; and 2021 Mercedes GL 5 Wagon, Vin# WINYC6BJ2MX388681 (collectively, the "Subject Properties") (D.E. 408).

**Background**

On or about November 1, 2023, the Court entered a Preliminary Order of Forfeiture (the "Preliminary Order") forfeiting to the Government all of the Defendant's right, title and interest in the Subject Properties. The Preliminary Order was docketed on or about January 3, 2024.

Pursuant to Rule 32.2(b)(6) of the Federal Rule of Criminal Procedure which governs criminal forfeiture proceedings, the Government began publication on [www.forfeiture.gov](http://www.forfeiture.gov) providing notice of the Government's intention to seek forfeiture of the Subject Properties on January 23, 2024 and publication ended on February 21, 2024. The claim period ended on March 23, 2024. Further, the Government provided direct notice to all third parties with a potential interest in the Subject Properties, by, *inter alia*, mailing a copy of the Preliminary Order to Petitioner on or about January 5, 2024.

On or about February 1, 2024, the Petitioner filed her Petition and asserted interests in the Subject Properties.

The Government requests a period of 60 days to confer with Petitioner's counsel about a potential resolution of the Petition. In the event those discussions do not result in a resolution, the Government may request a discovery schedule to resolve any factual disputes pursuant to Rule

32.2(c)(1)(B), which provides that the court may permit the parties to conduct discovery in the ancillary proceeding in accordance with the Federal Rules of Civil Procedure “if the court determines that discovery is necessary or desirable to resolve factual issues.” *Id.*

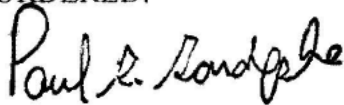
Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/  
Mathew Andrews  
Ryan W. Allison  
Assistant United States Attorneys  
Tel. (212) 637-6526 / -2474

**MEMO ENDORSED:** The application is granted. If the matter is not resolved at the conclusion of the 60-day period, the parties will file a joint status letter with the Court.

SO ORDERED.



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Paul G. Gardephe  
United States District Judge

Date: April 23, 2024